

## PRIVACY IMPACT ASSESSMENT (PIA)

**PRESCRIBING AUTHORITY:** DoD Instruction 5400.16, "DoD Privacy Impact Assessment (PIA) Guidance". Complete this form for Department of Defense (DoD) information systems or electronic collections of information (referred to as an "electronic collection" for the purpose of this form) that collect, maintain, use, and/or disseminate personally identifiable information (PII) about members of the public, Federal employees, contractors, or foreign nationals employed at U.S. military facilities internationally. In the case where no PII is collected, the PIA will serve as a conclusive determination that privacy requirements do not apply to system.

**1. DOD INFORMATION SYSTEM/ELECTRONIC COLLECTION NAME:**

Movements Automated Record Keeping System (MARKS)

**2. DOD COMPONENT NAME:**

United States Air Force

**3. PIA APPROVAL DATE:**

09/25/20

### SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

**a. The PII is:** (Check one. Note: foreign nationals are included in general public.)

- From members of the general public  From Federal employees and/or Federal contractors  
 From both members of the general public and Federal employees and/or Federal contractors  Not Collected (if checked proceed to Section 4)

**b. The PII is in a:** (Check one)

- New DoD Information System  New Electronic Collection  
 Existing DoD Information System  Existing Electronic Collection  
 Significantly Modified DoD Information System

**c. Describe the purpose of this DoD information system or electronic collection and describe the types of personal information about individuals collected in the system.**

MARKS is an enterprise records management solution used to coordinate, manage and track over 240,000 personal property shipments annually, a \$1.8B personal property operation. A central component to MARKS is a life-cycle storage and tracking of over 18M documents (~1.8M new documents per year) IAW disposition schedules. Information collected is Sensitive but Unclassified (For Official Use Only).

PII Collected - Individual's name, rank/grade, unit identification code (UIC), Service affiliation, Social Security Number (SSN), DoD ID number, mailing/home address, home/cell phone, emergency contact information, personal E-mail address, spouse and/or child information

**d. Why is the PII collected and/or what is the intended use of the PII?** (e.g., verification, identification, authentication, data matching, mission-related use, administrative use)

Verification and data matching in support of base entitlement processing and extension request processing.

**e. Do individuals have the opportunity to object to the collection of their PII?**  Yes  No

(1) If "Yes," describe the method by which individuals can object to the collection of PII.

(2) If "No," state the reason why individuals cannot object to the collection of PII.

Privacy Act Statement includes the following:

"DISCLOSURE: Voluntary; however, failure to provide the requested information may delay shipping dates and impede storage arrangements."

**f. Do individuals have the opportunity to consent to the specific uses of their PII?**  Yes  No

(1) If "Yes," describe the method by which individuals can give or withhold their consent.

(2) If "No," state the reason why individuals cannot give or withhold their consent.

During the interview process, an individual gives (general) consent for the government to use their PII. If an individual disagrees with how their PII is to be used (i.e., as specified in the Principle Purpose(s) and Routine Use(s) clauses in the Privacy Statement), they can refuse to sign the form, but doing so delays the government from coordinating transportation services on their behalf or to reimburse for transportation services an individual coordinates for themselves.

**g. When an individual is asked to provide PII, a Privacy Act Statement (PAS) and/or a Privacy Advisory must be provided.** (Check as appropriate and provide the actual wording.)

- Privacy Act Statement  Privacy Advisory  Not Applicable

Privacy Act Statement includes the following:

"DISCLOSURE: Voluntary; however, failure to provide the requested information may delay shipping dates and impede storage arrangements."

**h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component? (Check all that apply)**

Within the DoD Component

Specify.

Other Air Force components for ensuring movements, storage, and legal compliance

Other DoD Components

Specify.

Other DoD components for ensuring movements, storage, and legal compliance

Other Federal Agencies

Specify.

State and Local Agencies

Specify.

Contractor (Name of contractor and describe the language in the contract that safeguards PII. Include whether FAR privacy clauses, i.e., 52.224-1, Privacy Act Notification, 52.224-2, Privacy Act, and FAR 39.105 are included in the contract.)

Specify.

DOD approved Transportation Service providers and contractor organizations

Other (e.g., commercial providers, colleges).

Specify.

**i. Source of the PII collected is: (Check all that apply and list all information systems if applicable)**

Individuals

Databases

Existing DoD Information Systems

Commercial Systems

Other Federal Information Systems

**j. How will the information be collected? (Check all that apply and list all Official Form Numbers if applicable)**

E-mail

Official Form (Enter Form Number(s) in the box below)

Face-to-Face Contact

Paper

Fax

Telephone Interview

Information Sharing - System to System

Website/E-Form

Other (If Other, enter the information in the box below)

AF2473, DD1299, DD139, DD1131, DD1797, DD1857, DD1164, DD1840, DD1857

**k. Does this DoD Information system or electronic collection require a Privacy Act System of Records Notice (SORN)?**

A Privacy Act SORN is required if the information system or electronic collection contains information about U.S. citizens or lawful permanent U.S. residents that is retrieved by name or other unique identifier. PIA and Privacy Act SORN information must be consistent.

Yes  No

If "Yes," enter SORN System Identifier

F024 AF IL B

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or <http://dpcltd.defense.gov/Privacy/SORNs/>

or

If a SORN has not yet been published in the Federal Register, enter date of submission for approval to Defense Privacy, Civil Liberties, and Transparency Division (DPCLTD). Consult the DoD Component Privacy Office for this date

If "No," explain why the SORN is not required in accordance with DoD Regulation 5400.11-R: Department of Defense Privacy Program.

**l. What is the National Archives and Records Administration (NARA) approved, pending or general records schedule (GRS) disposition authority for the system or for the records maintained in the system?**

(1) NARA Job Number or General Records Schedule Authority.

N1-AFU-90-03; DAA-GRS-2013-0003-0001

(2) If pending, provide the date the SF-115 was submitted to NARA.

(3) Retention Instructions.

T 24 - 01 R 04.00; Commercial Movement of Goods or Personnel Case Files – Routine-- Destroy 10 years after the period of the account.  
T 24 - 01 R 07.00; Non-Temporary Storage (NOTEMPS) Case Files--Destroy 3 years after final disposition of stored goods and settlement of case

Note: Among the dispositions cited in this field, the one with the longest retention time will be used on the system's records data

**m. What is the authority to collect information? A Federal law or Executive Order must authorize the collection and maintenance of a system of records. For PII not collected or maintained in a system of records, the collection or maintenance of the PII must be necessary to discharge the requirements of a statute or Executive Order.**

- (1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be similar.  
(2) If a SORN does not apply, cite the authority for this DoD information system or electronic collection to collect, use, maintain and/or disseminate PII. (If multiple authorities are cited, provide all that apply).

- (a) Cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.  
(b) If direct statutory authority or an Executive Order does not exist, indirect statutory authority may be cited if the authority requires the operation or administration of a program, the execution of which will require the collection and maintenance of a system of records.  
(c) If direct or indirect authority does not exist, DoD Components can use their general statutory grants of authority ("internal housekeeping") as the primary authority. The requirement, directive, or instruction implementing the statute within the DoD Component must be identified.

Public Law 100-562, Imported Vehicle Safety Compliance Act of 1988;  
5 U.S.C. 5726, Storage Expenses, Household Goods and Personal Effects;  
10 U.S.C. 113, Secretary of Defense;  
10 U.S.C. 7013, Secretary of the Army;  
10 U.S.C. 8013, Secretary of the Navy;  
10 U.S.C. 9013, Secretary of the Air Force;  
19 U.S.C. 1498, Entry Under Regulations;  
37 U.S.C. 476, Travel and Transportation Allowances, Dependents, Baggage and Household Effects;  
Federal Acquisition Regulation (FAR);  
Joint Federal Travel Regulation (JTR), Volumes I and II;  
DoD Directive 4500.09E, Transportation, and Traffic Management;  
ASD(L&MR) Action Memo  
DoDM 4140.01, DoD Materiel Management Regulation;  
DoD Regulation 4500.9, Defense Transportation Regulation;  
DoD Instruction 4515.13-R, Air Transportation Eligibility; and E.O. 9397 (SSN), as amended

**n. Does this DoD information system or electronic collection have an active and approved Office of Management and Budget (OMB) Control Number?**

Contact the Component Information Management Control Officer or DoD Clearance Officer for this information. This number indicates OMB approval to collect data from 10 or more members of the public in a 12-month period regardless of form or format.

Yes  No  Pending

- (1) If "Yes," list all applicable OMB Control Numbers, collection titles, and expiration dates.  
(2) If "No," explain why OMB approval is not required in accordance with DoD Manual 8910.01, Volume 2, "DoD Information Collections Manual: Procedures for DoD Public Information Collections."  
(3) If "Pending," provide the date for the 60 and/or 30 day notice and the Federal Register citation.

MARKS does not collect data from 10 or more members of the public

**SECTION 2: PII RISK REVIEW**

**a. What PII will be collected** (a data element alone or in combination that can uniquely identify an individual)? (Check all that apply)

- |                                                          |                                                                                      |                                                                                        |
|----------------------------------------------------------|--------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|
| <input type="checkbox"/> Biometrics                      | <input type="checkbox"/> Birth Date                                                  | <input checked="" type="checkbox"/> Child Information                                  |
| <input type="checkbox"/> Citizenship                     | <input type="checkbox"/> Disability Information                                      | <input checked="" type="checkbox"/> DoD ID Number                                      |
| <input type="checkbox"/> Driver's License                | <input type="checkbox"/> Education Information                                       | <input checked="" type="checkbox"/> Emergency Contact                                  |
| <input type="checkbox"/> Employment Information          | <input type="checkbox"/> Financial Information                                       | <input type="checkbox"/> Gender/Gender Identification                                  |
| <input checked="" type="checkbox"/> Home/Cell Phone      | <input type="checkbox"/> Law Enforcement Information                                 | <input type="checkbox"/> Legal Status                                                  |
| <input checked="" type="checkbox"/> Mailing/Home Address | <input type="checkbox"/> Marital Status                                              | <input type="checkbox"/> Medical Information                                           |
| <input type="checkbox"/> Military Records                | <input type="checkbox"/> Mother's Middle/Maiden Name                                 | <input checked="" type="checkbox"/> Name(s)                                            |
| <input type="checkbox"/> Official Duty Address           | <input type="checkbox"/> Official Duty Telephone Phone                               | <input checked="" type="checkbox"/> Other ID Number                                    |
| <input type="checkbox"/> Passport Information            | <input checked="" type="checkbox"/> Personal E-mail Address                          | <input type="checkbox"/> Photo                                                         |
| <input type="checkbox"/> Place of Birth                  | <input type="checkbox"/> Position/Title                                              | <input type="checkbox"/> Protected Health Information (PHI) <sup>1</sup>               |
| <input type="checkbox"/> Race/Ethnicity                  | <input checked="" type="checkbox"/> Rank/Grade                                       | <input type="checkbox"/> Religious Preference                                          |
| <input type="checkbox"/> Records                         | <input type="checkbox"/> Security Information                                        | <input checked="" type="checkbox"/> Social Security Number (SSN) (Full or in any form) |
| <input type="checkbox"/> Work E-mail Address             | <input checked="" type="checkbox"/> If Other, enter the information in the box below |                                                                                        |

Unit identification code (UIC), Emergency contact information  
 Spouse Information: name, date of marriage  
 Child Information: name, date of birth, current address  
 Other: service affiliation, unit identification, type of shipment, origin, destination, and the date of application.

If the SSN is collected, complete the following questions.

*(DoD Instruction 1000.30 states that all DoD personnel shall reduce or eliminate the use of SSNs wherever possible. SSNs shall not be used in spreadsheets, hard copy lists, electronic reports, or collected in surveys unless they meet one or more of the acceptable use criteria.)*

(1) Is there a current (dated within two (2) years) DPCLTD approved SSN Justification on Memo in place?

- Yes  No

If "Yes," provide the signatory and date approval. If "No," explain why there is no SSN Justification Memo.

SSN Justification memo submitted to DoD on 9/23/20

(2) Describe the approved acceptable use in accordance with DoD Instruction 1000.30 "Reduction of Social Security Number (SSN) Use within DoD".

Must interact with other DoD systems that continue to use the SSN as a primary identifier

(3) Describe the mitigation efforts to reduce the use including visibility and printing of SSN in accordance with DoD Instructoin 1000.30, "Reduction of Social Security Number (SSN) Use within DoD".

- Access is restricted based on need-to-know & least privilege principles throughout the information life cycle
- Once received, PII is to remain within the defined boundary of the MARKS system security architecture
- Disclosure is only authorized for official purposes to arrange for personal property shipments and storage.
- Retention policy is established to ensure data is retained only as long as required to support operations
- When no longer required, privacy data is to be destroyed
- Documents containing PII are properly marked and labeled to help prevent accidental disclosure
- Casual disclosure of PII is protected by the use of cover sheets, computer screen locks and escort procedures
- Protection of PII training is provided to all users at least annually
- Users must acknowledge the system Rules of Behavior before access is authorized

(4) Has a plan to eliminate the use of the SSN or mitigate its use and or visibility been identified in the approved SSN Justification request?

If "Yes," provide the unique identifier and when can it be eliminated?

If "No," explain.

- Yes  No

Currently, no efforts are underway to eliminate usage of the SSN as the primary identifier from the listed systems. A consensus at the service level on restructuring these systems to rely on a new primary unique identifier would be required before any progress can be made

NOTE: Sections 1 above is to be posted to the Component's Web site. Posting of these Sections indicates that the PIA has been reviewed to ensure that appropriate safeguards are in place to protect privacy. A Component may restrict the publication of Sections 1 if they contain information that would reveal sensitive information or raise security concerns.